

**Federal Defenders
OF NEW YORK, INC.**

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October 29, 2021

By ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Lado Middlebrooks
21 Cr. 89 (RMB)**

Dear Judge Berman,

I write to respectfully request that the Court adjourn the deadline for Mr. Middlebrooks to reply to the government's response (Dkt. No. 33) to his motion (Dkt. No. 30) for one week: to November 8, 2021. Undersigned counsel has been on trial this week and needs more time to work on the reply. In addition, the government has made two additional discovery productions since Mr. Middlebrooks filed his motion and this brief extension will allow us to review the new materials as well, and incorporate them into the reply, if necessary.

The Government, by Assistant United States Attorney Sarah Kushner, has no objection to this application. Given the nature of this request, the defense consents to the exclusion of time under the Speedy Trial Act until the resolution of the motions.

Thank you for your consideration.

Respectfully submitted,

/s/

Sylvie Levine
Counsel for Mr. Middlebrooks

Application granted. Time is excluded
pursuant to the Speedy Trial Act for the
reasons set forth in this letter.

SO ORDERED:

Date: 11/1/21

Richard M. Berman
Richard M. Berman, U.S.D.J.